



May 15, 2012

***Via Electronic Filing***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Notice of Oral *Ex Parte* Communications, WC Docket Nos. 11-42, 03-109, 12-23; CC Docket No. 96-45**

Dear Ms. Dortch:

On May 11, 2012, Sarah Morris, Policy Counsel for New America Foundation's Open Technology Institute, spoke with Garnet Hanly, Attorney Advisor for the Federal Communications Commission's Wireline Competition Bureau, via phone to discuss concerns related to the Commission's proposed broadband pilot program. This notice is submitted in compliance with Section 1.1206(b) of the Commission's Rules.

Ms. Morris noted that given the public-facing data currently available, it is difficult or even impossible to determine which entities are currently designated as Lifeline Eligible Telecommunications Carriers (ETCs). Thus, a significant hurdle exists for non-ETC organizations who are interested in collaborating on a broadband pilot project to find ETCs in a given area with which to partner.

Specifically, there is no readily available information regarding the Study Area Code boundaries that define an ETC's service area. Knowing that boundary information (including the Study Area Code itself) would allow any interested party to search USAC's website to determine which ETCs are designated in a given geographic area; without it, interested organizations are left to track down that information in a piecemeal, largely ineffective way.

Alternatively, the Commission could use NTIA's online tool for facilitating collaboration for BTOP project funds as a model for broadband pilot program partnerships. The tool, BroadbadMatch, is "an online tool that allows Recovery Act grant recipients and other communities developing broadband projects and programs to connect

with a variety of potential partners.”<sup>1</sup> BTOP fund applicants were able to fill out a profile on the BroadbandMatch website, post it, and then search for other project partners. A similar website for the broadband digital pilot program would be a valuable way to facilitate collaboration among ETCs and other community organizations. It would also provide a neutral forum in which to initiate partnerships, and one that is not driven by industry members. We ask that the Commission consider providing such a tool, particularly if it does not make the Study Area Code data available.

Pursuant to the Commission’s rules, this notice is being filed in the above-referenced dockets for inclusion in the public record.

Respectfully submitted,

/s/ Sarah J. Morris

Sarah J. Morris  
Open Technology Institute  
New America Foundation  
1899 L Street NW Suite 400  
Washington, DC 20036

Cc: Garnet Hanly

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<sup>1</sup> <http://match.broadbandusa.gov/BTOPpartners/BPMhome.aspx>